## THE OFFICE OF REGULATORY STAFF

## **DIRECT TESTIMONY AND EXHIBITS**

**OF** 

SHARON G. SCOTT

MAY 3, 2010



**DOCKET NO. 2009-489-E** 

Application of South Carolina Electric & Gas Company for Increases and Adjustments in Electric Rate Schedules and Tariffs

1		DIRECT TESTIMONY OF SHARON G. SCOTT
2		FOR
3		THE OFFICE OF REGULATORY STAFF
4		DOCKET NO. 2009-489-E
5 6 7 8 9		IN RE: APPLICATION OF SOUTH CAROLINA ELECTRIC & GAS COMPANY FOR INCREASES AND ADJUSTMENTS IN ELECTRIC RATE SCHEDULES AND TARIFFS
10	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.
11 :	A.	My name is Sharon G. Scott. My business address is 1401 Main Street, Suite
12		900, Columbia, South Carolina, 29201. I am employed by the South Carolina Office of
13		Regulatory Staff ("ORS") as a Senior Manager for Rate Cases.
14	Q.	PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND YOUR
15		BUSINESS EXPERIENCE.
16	A.	I received a Bachelor of Science in Business Administration, with a major in
17		Accounting from the University of South Carolina in May 1983 and a Master of Business
18		Administration from Webster University in May 2000. I began my career with the Public
19		Service Commission of South Carolina ("Commission") in July 1983 and while employed
20		there, I participated in numerous rate cases and various other filings for electric, gas,
21		telecommunications, water and wastewater utilities. In January 2005, I began my
22		employment with ORS and became manager of Water and Wastewater and
23		Telecommunications Audits. Currently, I am Senior Manager for all rate cases.
24	Q.	WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS
25		PROCEEDING?

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1	A.	The purpose of my testimony is to set forth the findings and recommendations
2		resulting from ORS's examination of the application of South Carolina Electric & Gas
3		Company ("Company" or "SCE&G"), in Docket No. 2009-489-E. These findings and
4		recommendations are explained in detail in my testimony and attached exhibits.

## 5 Q. PLEASE DESCRIBE THE PROCEDURES USED TO PERFORM THE 6 EXAMINATION OF SCE&G'S APPLICATION.

ORS's examination of the Company's application for Adjustments and Increases in Electric Rate Schedules and Tariffs consisted of three major steps. In step one, ORS verified that the operating experience and rate base, reported by the utility in its application, were supported by the Company's accounting books and records for the test year. In the second step ORS tested the underlying transactions in the books and records for the same period to ensure that the transactions were adequately supported, had a stated business purpose, were allowable for ratemaking purposes and were properly recorded. Lastly, our examination consisted of adjusting, as necessary, the revenues, expenditures and capital investments to normalize the Company's operating experience and rate base, in accordance with generally accepted regulatory principles and Commission orders.

## Q. PLEASE IDENTIFY THE EXHIBITS ATTACHED TO YOUR TESTIMONY.

- 19 A. I have attached the following exhibits to my testimony relating to Total Electric 20 and Retail Electric operations:
  - Audit Exhibit SGS-1: Operating Experience, Rate Base and Rate of Return
- Audit Exhibit SGS-2: Explanation of Accounting and Pro Forma Adjustments
  - Audit Exhibit SGS-3: Calculation of State and Federal Income Taxes

<ul> <li>Audit Exhibit SGS-5: Working Capital Investment</li> <li>Audit Exhibit SGS-6: Weighted Cost of Capital</li> </ul>	
Audit Exhibit SGS-6: Weighted Cost of Capital	
Audit Exhibit SGS-7: Computation of Revenue Requirement	
These exhibits were either prepared by me or under my direction and	supervision
6 in compliance with recognized accounting and regulatory procedures for ele	ectric utility
7 rate cases. These exhibits show various aspects of SCE&G's operations ar	nd financial
8 position.	
9 Q. PLEASE DESCRIBE THE FORMAT OF AUDIT EXHIBIT SO	SS-1 AND
10 ELABORATE ON THE CALCULATIONS.	•
Audit Exhibit SGS-1 shows SCE&G's operating experience, rate base	and rate of
return for Total Electric and Retail Electric operations for the test year ended	September
30, 2009. Note, that for presentation purposes, all exhibits report dollar	amounts in
thousands (000's omitted).	
15 Column (1) shows Total Electric Operations, Per Regulatory Books. O	RS verified
operating revenues of \$2,142,853,000, total operating expenses of \$1,774,613,0	000 and net
income for return of \$368,882,000 to the Company's books and records. Of	RS verified
Total rate base of \$5,249,884,000. Total Per Regulatory Books rate of return	n of 7.03%
was calculated by dividing net income for return by the total rate base.	
Column (2) shows ORS proposed accounting and pro forma adjustmen	ts designed
21 to normalize operating experience for Total Electric Operations.	
Column (3) shows the Company's Total Electric Operations af	fter ORS's

1		Column (4) reflects the Company's allocation of Total Electric, Per Regulatory
2		Books, to Retail Electric Per Books. Using Retail Electric Per Books, net income for return
3		of \$353,206,000 and total rate base of \$5,103,183,000, a rate of return of 6.92% was
4		computed. The return on common equity was 7.62% as shown on Audit Exhibit SGS-6.
5		Column (5) shows ORS accounting and pro forma adjustments to Retail Electric
6		Operations. Each adjustment is shown in Audit Exhibit SGS-2 and explained further in the
7		testimonies of ORS's witnesses.
8		Column (6) shows the Company's Retail Electric Operations after ORS accounting
9		and pro forma adjustments by combining columns (4) and (5). Using net income for return
10		of \$359,977,000 and total rate base of \$4,759,342,000, a rate of return of 7.56% was
11		computed. The return on common equity was 8.83% as shown on Audit Exhibit SGS-6.
12		Column (7) shows the Company's Proposed Increase along with the resultant tax
13		adjustments for Retail Electric Operations.
14		Column (8) presents the results of Retail Electric Operations after the Company's
15		proposed increase by combining columns (6) and (7). Using net income for return of
16		\$481,842,000 and total rate base of \$4,759,342,000, a rate of return of 10.12% was
17		computed. The return on common equity was 13.66% as shown on Audit Exhibit SGS-6.
18	Q.	PLEASE EXPLAIN THE ADJUSTMENTS IN AUDIT EXHIBIT SGS – 2.
19	Α.	Explanations of the ORS Accounting and Pro forma Adjustments are listed
20		separately as 'SCE&G Total Electric', 'ORS Total Electric' and 'ORS Retail Electric'.
21		The ORS Electric Department verified the retail allocated amounts and reviewed various
22		other adjustments as noted. The adjustments are as follows:
23		Electric Operating Revenues:

1	Adjustment #1 -Remove Revenue for New Nuclear Generation
2	ORS and the Company propose to remove revenues of (\$4,771,235) associated with the
3	construction of the new V.C. Summer Units #2 and #3 in Jenkinsville, South Carolina.
4	ORS verified the test year revenue of (\$4,771,235) associated with the new construction to
5	the Company's books and records.  The total amount removed is allocated to retail
6	customers.
7	Adjustment #2 – Wholesale Customer Adjustment
8	ORS and the Company propose to reduce revenues by (\$16,604,875) for the removal of the
9	City of Greenwood, a wholesale customer. The power supply agreement with the City of
10	Greenwood expired on December 31, 2009. The total amount removed is allocated to
11	wholesale operations.
12	Adjustment #3 – Storm Damage Reserve Fund
13	ORS proposes to suspend annual customer contributions of \$6,399,812 to the storm
14	damage reserve fund. The total amount is allocated to retail electric operations. Details of
15	this adjustment are discussed by ORS Electric Department witness Leigh C. Ford.
16	Operation and Maintenance Expense – Fuel & Other:
17	Adjustment #4 - Annualize Wages and Benefits
18	The Company proposes to annualize salary expense based on salary levels in effect as of
19	September 30, 2009 and adjust for benefits which include long and short-term disability
20	and 401K expenditures. ORS recalculated and verified the payroll adjustment to the
21	Company's books and records. ORS proposes to allow only those pay increases associated
22	with contract union wages of \$3,379,370. The retail allocated portion is \$3,249,264. ORS

The Company proposes to annualize health care costs using the expense level during the last quarter of the test year which resulted in an adjustment of \$1,010,843. ORS proposes to adjust health care costs using a more current 12-month period ending February 2010.

ORS computed annualized health care costs of \$14,966,060. Actual test year health care

## Adjustment #12 – Annualize Insurance Premiums

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The Company proposes to increase insurance expenses by annualizing the expense level during September 2009. ORS reviewed several months in the test year, all of which were consistent with the September 2009 expense level. Insurance policies, which included coverage for property, workers' compensation, and other liability coverage, were sampled for accuracy and monthly premiums examined with no exceptions. ORS and the Company propose an increase to insurance premiums of \$34,763. The retail allocated amount is \$33,878.

### Adjustment #13 – Adjust Storm Insurance Premiums

Page 8

Per Commission Order No. 2007-680, SCE&G was authorized to pay premiums for a
storm insurance policy from funds in the Storm Reserve until the next rate proceeding. In
its application, the Company proposes to include premiums totalling \$3,210,000 for the
policy in test year operating expenses. ORS does not propose to make this adjustment for
reasons discussed in the testimony of ORS Electric Department witness Leigh C. Ford.
Adjustment #14 – VCS Refueling Outage Accrual
The Company proposes to reflect a decrease of (\$92,593) to the test year outage accrual
expense of \$14,759,259 to reflect the current outage accrual of \$14,666,667. The outage
accrual expenses for the VC Summer Nuclear Plant, of which SCE&G has two-thirds (2/3)
ownership and Santee Cooper one-third (1/3) ownership, is based on an 18-month cycle.
ORS verified the outage accrual and actual expense in the test year. ORS Electric
Department witness A. Randy Watts reviewed the Company's nuclear refueling budget and
recommends a budget of \$28,625,000, which results in an annual outage accrual of
\$12,722,222. ORS proposes to reduce test year expenses by (\$2,037,037) to reflect the
ORS recommended outage accrual. The retail allocated amount is (\$1,940,522).
Adjustment #15 – COGEN South Allocation
In March 2009, the owner of COGEN South, a bio-mass steam and electric generating
facility, changed its methodology for allocating costs between fuel, lime, and operating and
maintenance expenses. ORS and the Company propose to reduce operating and
maintenance ("O&M") expenses to reflect the costs that would have been charged to fuel
under the new methodology. ORS verified actual cost for the test year of \$12,642,749 and
pro forma cost using the new allocation method of \$10,421,086, which resulted in a
reduction to O&M of (\$2,221,663). The retail allocated amount is (\$2,137,107).

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## Adjustment #16 – Tree Trimming Costs

The Company proposes an adjustment of \$6,612,809 based on budgeted tree trimming costs of \$19,782,231 compared to the tree trimming amounts in the current rates of \$13,169,422. ORS reviewed per book tree trimming expenses and verified actual expenses included in the test period of \$15,909,402. ORS proposes to set the level for tree trimming expenses at the current level included in rates of \$13,169,422. An adjustment of (\$2,739,980) was computed to reach the current level included in rates. The entire amount is allocated to Retail operations. The explanation of the current level for tree trimming expenses is discussed by ORS Electric Department Witness Leigh C. Ford.

## Adjustment #17 – Major Maintenance Expenses

The Company proposes to increase the current major maintenance accrual by \$10,789,611, to reflect an increase in annual major maintenance expenses. ORS proposes an adjustment of \$9,971,870, which reflects annual major maintenance expenses of \$18,435,780 less the amount currently in rates of \$8,463,910. The retail allocated amount is \$9,557,240. ORS Electric Department witness A. Randy Watts will discuss the basis for the annual major maintenance expenses required and the Company's proposed request for carrying cost for under-recovered expenses in the monthly accrual account.

Additionally, the true-up mechanism for the major maintenance accrual was examined by

the ORS Audit Department. ORS verified the computation of the carrying cost on the over-recovery of actual expenses and verified the actual balances at December 31, 2009.

ORS did not find any material variance between actual and accrued expenses.

### Adjustment #18 – Wholesale Customer Adjustment

1	ORS and the Company propose to reduce expenses by (\$10,046,255) for the removal of
2	City of Greenwood, a wholesale customer. As stated in Adjustment #2, the power supply
3	agreement with the City of Greenwood expired on December 31, 2009. The total amount
4	removed is allocated to wholesale operations.
5	Adjustment# - 19 - Adjust for Upflow Modification
6	In Order No. 2007-644, the Company was allowed to defer the cost of upflow
7	modifications to V.C. Summer Unit #1, to be reviewed in the current case. ORS verified
8	total deferred charges of \$5,882,067 which the Company proposes to amortize over 10
9	years. ORS proposes to amortize these expenses over the remaining life of the plant, 32
10	years, as discussed by the ORS Electric Department witness M. Anthony James. ORS
11	computed an adjustment of \$183,815. The retail allocated amount is \$174,679.
12	Adjustment #20 – Amortization of Grid South
13	In Docket No. 2004-178-E, the Company was authorized to amortize costs associated with
14	its investment in a Regional Transmission Organization, which was later abandoned.
15	These costs were fully amortized as of December 2009. ORS verified the per book amount
16	of (\$2,713,691) and also proposes to remove these expenses from the test year. The retail
17	allocated amount is (\$2,607,423).
18	Adjustment #21 – Capacity Purchases
19	Per PSC Orders No. 2009-295 and 2008-530, the Company was authorized to defer
20	capacity purchases for wholesale power sales. Capacity purchases of \$2,960,000 were
21	verified to the Company's book and records. ORS and the Company propose to amortize
22	these expenses over 10 years, resulting in an adjustment of \$296,000. The retail allocation
23	is \$284,708.

1	Adjustment #22 – Amortize Rate Case Costs
2	The Company proposes to amortize rate case expenses of \$460,225 over a five-year
3	period. ORS proposes to amortize actual rate case expenses, verified as of April 22,
4	2010, of \$226,909 over a five-year period, resulting in test year rate case expenses of
5	\$45,382. The total amount is allocated to retail costs.
6	Adjustment #23 - Amortize Preliminary Survey Investigation ("PSI") Costs
7	SCE&G proposes to recover PSI costs over a three-year period. ORS verified the total cost
8	of \$947,829 to the Company books and records and proposes to amortize these expenses
9	over a 10-year period, resulting in an adjustment of \$94,783. The retail allocated amount
10	is \$91,172. ORS Electric Department witness Leigh C. Ford will discuss PSI costs in her
11	testimony.
12	Adjustment #24 – Amortize Economic Development Grant
13	On December 29, 2009, Commission Order No. 2009-207 was issued granting the
14	Company approval to defer a \$1,000,000 economic development grant to Barnwell County.
15	The grant was used to attract Crane Company, a vending machine manufacturing company,
16	to relocate, consolidate, and merge with its subsidiary Dixie-Narco, Inc. in Williston, South
17	Carolina. The vending operations of the Dixie-Narco facility is expected to preserve jobs
18	and create new jobs for Barnwell County. The Order approved the deferral and the
19	amortization of the grant to electric operating expenses over the ten-year term of the
20	contract. ORS and the Company propose an adjustment of \$100,000. The retail allocated
21	amount is \$97,270.
22	Adjustment #25 – Cost Savings for New Facility

1	In October 2009, SCE&G moved employees from the Palmetto Center, the 1401 Main
2	Street building and the Carolina Research Park to its new campus in Cayce, SC. An
3	analysis was provided by the Company comparing the cost of the previous leased space to
4	the cost of operating the new campus. ORS reviewed the analysis and verified the
5	following information:
6	The new Cayce office building is owned by the SCANA Corporation
7	SCE&G is allocated a portion of the operating costs based on service company
8	allocators
9	ORS verified and recalculated the costs associated with the analysis, such as
0	verifying the new tax bills as well as recomputing depreciation expense and interest
1	costs
2	• ORS verified a savings in O&M expenses of \$378,209
3	• ORS verified a savings in capital costs of \$216,142
4	ORS therefore proposes to reduce operating and maintenance expenses by (\$378,209) to
5	reflect a cost saving for the new facility. The retail allocated amount is (\$368,111). ORS
6	also proposes to reduce capital expenditures by (\$216,142) as shown in Adjustment #54.
7	Adjustment #26 – Remove Non-allowable Expenses
8	ORS proposes to decrease O&M expenses for items considered non-allowable for
9	ratemaking purposes. These expenses include donations, lobbying expenses, alcoholic
0	beverages, service awards, advertising, certain aircraft expenses, one-half of Chamber of
1	Commerce dues and other miscellaneous items. ORS considers these items non-allowable
2	as they are not necessary to provide electric service. Additionally, during our review of
3	non-allowable expenses. ORS did not find any contributions made to political campaigns.

1	ORS proposes to remove non-allowable expenses of (\$1,584,973). The SC Retail allocated
2	amount is (\$1,543,764).
3	Adjustment #27 – Remove Abandoned Projects
4	ORS proposes to remove abandoned projects charged to operating expenses as such
5	projects were not beneficial to the ratepayer. The abandoned projects included such
6	projects as Urquhart Security, Integral Missile Shield, Flow Transmit, SAL Oil/Water
7	Separator, Fuel Oil Unloading Catch Basin and FW Venturi Replacement. ORS removed
8	(\$105,094) from operating expenses. The retail allocated amount is (\$102,362).
9	Depreciation and Amortization Expense
10	Adjustment #28 – Remove Employee Clubs
11	The Company proposes to remove depreciation expense related to employee clubs, Pine
12	Island, Sand Dunes, and Misty Lake, which are owned and operated by SCE&G. The
13	expenses for these clubs, which are not necessary for the provision of electric service and
14	provide no benefit to the customers, were recomputed and verified to the Company's books
15	and records. ORS and the Company propose to remove (\$179,944) from test year
16	operating expenses. The retail allocated amount is (\$175,273).
17	Adjustment #29 - Recognize Property Additions - Additional CWIP - Depreciation
18	Expense
19	SCE&G proposes an adjustment to include depreciation expenses for plant additions
20	completed as of November 2009. ORS examined the various work orders and verified
21	that the projects were complete and work orders closed. ORS recomputed the
22	depreciation expense using depreciation rates recommended by the ORS Electric

Depreciation Expense – Wateree Environmental, Adjustment #36 Wateree

17 **Environmental Deferred Expenses** 

These adjustments are discussed in the testimony of ORS Audit Department witness Daniel

F. Sullivan.

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## **Taxes Other Than Income**

21 Adjustment #37 – Annualize Payroll Taxes

1 The Company proposes to adjust for payroll taxes associated with the payroll increase. 2 ORS adjusted for payroll taxes associated with wage increases, for union employees only, 3 of \$239,860. The retail allocated portion is \$230,626. 4 Adjustment #38 – Payroll Taxes – Incentive Pay 5 SCE&G proposes to remove 50% of the payroll taxes accrued for electric bonuses. Since 6 ORS proposes to remove all incentive pay, an adjustment is made to remove total accrued 7 payroll taxes of (\$1,050,472). The retail allocation amount is (\$1,021,374). 8 Adjustment #39 – Remove Taxes for New Nuclear Generation 9 The Company proposes to remove taxes associated with the construction of the new V.C. 10 Summer Units #2 and #3 in Jenkinsville, South Carolina. ORS verified the gross receipts 11 and ORS/Commission assessments and proposes a reduction of (\$21,757) for taxes 12 associated with the removal of new nuclear construction. The total amount is allocated to 13 retail customers. 14 Adjustment #40 – Property Taxes 15 The Company proposes an adjustment of \$5,456,574 to annualize the impact on the Company's property taxes by applying the average millage rate to additions to plant in 16 service. ORS verified and recomputed property taxes based on net plant in service at the 17 18 end of the test year and ORS proposed pro forma plant additions. ORS proposes to 19 increase property tax expenses by \$4,321,714. The retail allocated amount is \$4,211.510. Adjustment #41 – Wholesale Customer Adjustment 20 21 The Company proposes to remove gross receipts and ORS/Commission assessments to 22 reflect the removal of the City of Greenwood, a wholesale customer. As stated in 23 Adjustment #2, the power supply agreement with the City of Greenwood expired on

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- December 31, 2009. ORS and the Company propose to reduce taxes other than income by (\$75,718) for total electric operations. The entire amount is allocated to wholesale operations.
  - Adjustment #42 Gross Receipts Taxes Storm Damage Reserve
  - ORS proposes to include gross receipts and ORS/Commission assessment taxes associated with the revenue due to the suspension of the customer contributions to the storm reserve fund. ORS proposes an adjustment of \$28,971, using the increase in revenue of \$6,399,812 and the most recent gross receipts factor of .004527. The total amount is allocated to retail operations.

## **Income Taxes**

## Adjustment #43 – Economic Impact Zone Tax Credits (EIZ)

SCE&G qualifies for Economic Impact Zone ("EIZ") Tax Credits for construction of electric production facilities in designated South Carolina counties. The Company was previously in litigation with the SC Department of Revenue regarding qualification of certain facilities and timing and use of the credits generated. Recently, the case was resolved and the Company received a tax refund for EIZ tax credits. SCE&G proposes to pass these credits to the customers as a reduction to income taxes. Additionally, the Company proposes to change the method to flow-through the credits annually to the customer instead of returning the credits over the life of the assets. ORS proposes to flow the credits to the customers over a 2-year period instead of the 5-year period proposed by the Company. ORS Electric Department witness A. Randy Watts will discuss the amortization period for the tax credits. ORS computed an adjustment of (\$16,575,698) which includes the pass-through of EIZ tax credits, net of taxes, of (\$15,437,500) and the

net effect of a yearly flow-through of the credit of (\$1,138,198). The retail allocated
amount is (\$16,153,018).
Adjustment #44 - Tax Effect of Annualized Interest
ORS and the Company propose to reflect the impact on state and federal income taxes of
annualized interest associated with the pro forma adjustments to rate base. Using the
change in rate base for pro forma adjustments, ORS computed the impact on state and
federal income taxes using the long-term debt ratio of 47.04% and cost of debt of 6.14%.
Adjustment #45 – Income Taxes This adjustment reflects the effects of the
accounting and pro forma adjustments on the Company's state and federal income taxes.
ORS's computation is shown in Audit Exhibit SGS-3.
Customer Growth
Adjustment #46 - Compute Customer Growth
This adjustment reflects customer growth for Total Electric and Retail Electric operations.
Per book growth factors were used for the Total Electric operations. The customer growth
factor of .003412 for Retail Electric operations was provided by ORS Electric Department
witness A. Randy Watts. Retail Electric customer growth was computed using net income
for return and the customer growth factor.
Interest on Customer Deposits
Adjustment #47 - Annualize Interest on Customer Deposits - ORS proposes to annualize
interest on customers' deposits using the Commission approved interest rate of 3.5% and
the year-end customer deposits of \$35,549,802 of which 79.39% is allocated to electric
operations, for a total amount of \$987,804. ORS computed total after tax electric interest on
customer deposits of \$609,969 which results in an adjustment to increase per book after tax

1	interest of \$588,065 by (\$21,904). Total interest on customer deposits is allocated to retail
2	customers.
3	Plant in Service
4	Adjustment #48 – Remove Plant for Employee Clubs
5	The Company proposes to remove plant in service related to employee clubs, Pine Island,
6	Sand Dunes, and Misty Lake, which are owned and operated by SCE&G. The plant in
7	service associated with these clubs, which are not necessary for the provision of electric
8	service and provide no benefit to the customer, were verified to the Company's books and
9	records. ORS and the Company propose to remove (\$4,828,633) from test year plant in
10	service. The retail allocated amount is (\$4,703,043).
11	Adjustment #49 - Property Retirements
12	The Company proposes to reduce Plant in Service by (\$4,347,891) to reflect pro forma
13	retirements of Steam Production, Nuclear Production, Other Production, Transmission and
14	Common Plant as of September 30, 2009. ORS verified retirements to the Company's
15	books and records and found an overstatement of retirements by \$356,814. ORS, therefore,
16	proposes an adjustment of (\$3,991,077). The retail allocated amount is (\$3,838,968).
17	Adjustment #50 - CWIP Closed to Plant
18	The Company proposes to increase plant in service by \$12,728,445 for property additions
19	and for carrying costs on the remaining unrecovered plant associated with the Saluda River
20	back-up dam. The synthetic fuel credits, which funded the majority of the cost of the
21	Saluda River back-up dam, expired in 2004. ORS verified the plant additions to the
22	Company's books and records and recomputed the carrying costs. The Company proposed

phased in rates and computed carrying costs on the unrecovered Saluda River back-up dam

### **Accumulated Depreciation**

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#### Adjustment #55 – Remove Employee Clubs

The adjustment removes accumulated depreciation related to employee clubs. Pine Island. Sand Dunes, and Misty Lake, which are owned and operated by SCE&G. accumulated depreciation was verified to the Company's books and records. ORS and the

Adjustment #60 - Cope SCR, Adjustment #61 - Peaking Turbines, Adjustment #62 -

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(\$13,182,529).

Wateree Environmental CWIP

1 These adjustments are discussed in the testimony of ORS Audit Department witness Daniel 2 F. Sullivan. 3 Construction Work in Progress (CWIP) 4 Adjustment #63 - Remove CWIP for New Nuclear Generation 5 The Company proposes to remove CWIP associated with the construction of the new V.C. 6 Summer Units #2 and #3 in Jenkinsville, South Carolina. ORS verified the test year CWIP 7 associated with new construction to the Company's books and records. Both the Company 8 and ORS propose to remove (\$388,203,321) for new nuclear construction. The total 9 amount allocated to retail customers is (\$373,432,184). 10 Adjustment #64 – CWIP Closed to Plant 11 The Company proposes to remove completed projects from CWIP and move to plant in 12 service. ORS verified the plant additions to the Company's books and records. ORS and 13 the Company propose to reduce CWIP by (\$5,870,660) and move these costs to plant in service. The retail allocated amount is (\$5,862,709). 14 15 Adjustment #65 - Recognize Property Additions SCE&G proposes to remove from CWIP, projects completed at the end of the test year. 16 ORS verified total projects completed at September 30, 2009 of (\$16,956,898) and both 17 18 the Company and ORS propose to remove this amount from CWIP. The retail allocated 19 amount is (\$16,462,413.) 20 Adjustment #66 - Wateree Environmental in CWIP 21 This adjustment is discussed in the testimony of ORS Audit Department witness Daniel F. 22 Sullivan. 23 **Deferred Debits and Credits** 

**Materials and Supplies** 

1	Adjustment #67 – Storm Damage Reserve
2	ORS proposes to increase the storm damage reserve for the overfunding of the storm
3	insurance premiums. ORS proposes an adjustment of (\$407,394) to reflect the total
4	premium cost over the \$2.7 million allowed per year according to Order No. 2007-680.
5	The total amount is allocated to retail operations. See Audit Exhibit SGS – 4.
6	Working Capital
7	Adjustment # 68 – Working Capital Investment
8	ORS and the Company propose to adjust working capital for accounting and pro forma
9	adjustments to operating and maintenance expenses as set forth in Audit Exhibit SGS-5.
10	Additionally, ORS proposes to adjust for the following:
11	(1) Increase the amount of Customer Deposits removed by the annualized amount of
12	(\$35,473), the difference in customer deposits before taxes (\$987,805 - \$952,332). The
13	total amount is allocated to retail.
14	(2) Reduce working capital funds to be collected in advance of refueling Cycle 19, based
15	on the ORS recommended budget of \$28,625,000. To reflect the collection of this amount
16	over an 18-month period, ORS used average costs of \$14,312,500 (\$28,625,000/2) at
17	SCE&G's 2/3 ownership, for a resulting expense level of \$9,541,667. An expense amount
18	of \$6,792,500 is computed after taxes less per book working capital of \$5,891,979,
19	produces an adjustment of \$900,521. The retail allocated amount is \$857,476.
20	(3) Remove unclaimed funds of (\$488,176) from working capital since the Company has
21	use of these funds until escheated to the state. The total amount is allocated to retail
22	operations.

## THE OFFICE OF REGULATORY STAFF 1401 Main Street, Suite 900 Columbia, SC 29201

This adjustment accounts for the customer growth associated with the proposed increase

using the customer growth factor of .003412 as provided by ORS Electric Department

Adjustment #73 – Adjust Customer Growth for the Proposed Increase

19

20

21

22

witness A. Randy Watts.

- 1 Q. ARE YOU AWARE OF THE STIPULATION BETWEEN ORS AND THE
  2 COMPANY IN REGARDS TO THE RETURN ON EQUITY?
- 3 A. Yes, I am.
- 4 Q. PLEASE EXPLAIN THE IMPACT ON THE REVENUE REQUIREMENT OF THIS STIPULATION.
- As shown on Audit Exhibit SGS-7, the stipulation of the return on equity of 10.7% would result in a revenue requirement of \$76.9 million. ORS Electric Department witness

  A. Randy Watts will discuss, as stipulated, a reduction to this revenue requirement for a

  \$25 million adjustment reflecting abnormal weather.
- 10 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- 11 A. Yes, it does.

## South Carolina Electric & Gas Company Operating Experience, Rate Base and Rate of Return Total and Retail Electric

## For the Test Year Ended September 30, 2009 Docket No. 2009-489-E

(000's Omitted	(OI	00's	Om	ittec	ľ
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		T	OTAL ELECTRIC	(000'8 1	Omitted)	RF	TAIL ELECTRIC		
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
		_	ORS	After ORS	<b>-</b>	ORS	After ORS	0	After
		Per	Accounting	Accounting	Retail	Accounting	Accounting & Pro Forma	Company's	Company's
Line		Regulatory	& Pro Forma	& Pro Forma	Per	& Pro Forma		Proposed Increase	Proposed Increase
No.	<u>Description</u>	Books	Adjustments	Adjustments	Books	Adjustments	Adjustments	IIICIBASB	IIICIBASB
1	Operating Revenues	\$ 2,142,853	(14,976) <b>(A)</b>	2,127,877	2,058,819	1,629 <b>(A)</b>	2,060,448	197,575 <b>(O)</b>	2,258,023
2	Operating Expenses:								700.050
3	O&M Expenses - Fuel	802,592	0 <b>(B)</b>	802,592	762,850	0 (B)	762,850	0	762,850
4	O&M Expenses - Other	467,769	6,163 <b>(C)</b>	473,932	454,836	15,271 <b>(C)</b>	470,107	0	470,107
5	Depreciation & Amort. Expenses	244,109	(8,118) <b>(D)</b>	235,991	237,548	(8,028) <b>(D)</b>	229,520	0	229,520
6	Taxes Other Than Income	138,977	3,443 (E)	142,420	134,973	3,429 (E)	138,402	894 (P)	139,296
7	Total Income Taxes	121,166	(18,906) <b>(F)</b>	102,260	116,021	(15,813) <b>(F)</b>	100,208	75,230_(Q)	175,438
8	Total Operating Expenses	1,774,613	(17,418)	1,757,195	1,706,228	(5,141)	1,701,087	76,124	1,777,211
9	Operating Return	368,240	2,442	370,682	352,591	6,770	359,361	121,451	480,812
10	Customer Growth	1,230	8 (G)	1,238	1,203	23 (G)	1,226	414 (R)	1,640
11	Int.on Cust. Deposits (Net of Taxes)	(588)	(22) (H)		(588)	(22) (H)	(610)	0	(610)
12	Net Income for Return	368,882	2,428	371,310	353,206	6,771	359,977	121,865	481,842
13	Rate Base:								
14	Gross Plant in Service	7,762,108	60,715 <b>(1)</b>	7,822,823	7,564,419	58,690 (I)	7,623,109	0	7,623,109
15	Less: Reserve for Depreciation	2,929,422	(13,364) (J)	2,916,058	2,849,416	(13,089) <b>(J)</b>	2,836,327	0	2,836,327
16	Net Plant in Service	4,832,686	74.079	4,906,765	4,715,003	71,779	4,786,782	0	4,786,782
17	Construction Work in Progress	849,470	(404,496) (K)	444,974	819,213	(389,471) <b>(K)</b>	429,742	0	429,742
18	Deferred Debits/Credits	(114,140)	(407) (L)	(114,547)	(111,841)	(407) <b>(L)</b>	(112,248)	0	(112,248)
19	Total Working Capital	59,956	(2,372) (M)	57,584	55,773	(1,141) <b>(M)</b>	54,632	0	54,632
20	Materials & Supplies	310,805	(25,888) (N)	284,917	297,681	(24,601) (N)	273,080	0	273,080
21	Accumulated Deferred Income Taxes	(688,893)	0	(688,893)	(672,646)	0	(672,646)	0	(672,646)
22	Total Rate Base	\$ 5,249,884	(359,084)	4,890,800	5,103,183	(343,841)	4,759,342	0	4,759,342
23	Rate of Return	7.03%		7.59%	6.92%		7.56%		10.12%
24	Return on Common Equity				7.62%		8.83%		13.66%

Per	Adj.# Per ORS	Description (000's Omitted)		SCE&G Total Electric	ORS Total Electric	ORS Retail Electric
дрр.	(A)	Operating Revenues		Electric	Lieotric	Licouro
7	1	Remove amounts associated with the new nuclear generation	\$	(4,771)	(4,771)	(4,771)
26	2	Remove revenue for the Wholesale Customer Adjustment		(16,605)	(16,605)	0
	3	Adjust for suspension of Storm Reserve Fund	_	0	6,400	6,400
		Total Operating Revenues	\$	(21,376)	(14,976)	1,629
,	(B & C)	Operating and Maintenance Expense - Fuel & Other				
1	4	Annualize wages and benefits	\$	7,126	3,379	3,249
2	5	Remove incentive pay		(8,205)	(16,410)	(15,992)
3	6	Remove per book pension income		3,526	3,526	3,429
4	7	Adjust health care costs		1,010	(108)	(105)
5	8	Remove operating expenses related to employee clubs		(388)	(388)	(377)
15	9	Adjust for Wateree Environmental costs		3,149	0	0
17	10	Adjust for Williams Station Environmental operating costs		28,993	26,981	25,950
18	11	Amortize Williams Station deferred expenses		2,899	283	272
20	12	Annualize insurance expense premiums		35	35	34
21	13	Adjust for storm insurance premiums		3,210	0	0
22	14	Adjust for the V.C. Summer (VCS) nuclear refueling outage accrual		(93)	(2,037)	(1,941 <b>)</b>
23	15	Adjust for the COGEN South Allocation		(2,222)	(2,222)	(2,137)
24	16	Adjust for tree trimming costs		6,613	(2,740)	(2,740)
25	17	Adjust for major maintenance expenses		10,790	9,972	9,557
26	18	Adjust for wholesale customer		(10,046)	(10,046)	0
29	19	Amortize Upflow Modification		588	184	175
30	20	Adjust for full Amortization of Grid South		(2,714)	(2,714)	(2,607)
31	21	Amortize Capacity Purchases over 10 years		296	296	285
32	22	Amortize Rate Case Expenses		92	45	45
33	23	Amortize Preliminary Survey Investigation (PSI) costs		315	95	91
34	24	Amortize Economic Development Costs		100	100	97
	25	Adjust operating and maintenance to reflect cost savings for the new facility		0	(378)	(368)
	26	Remove expenses considered non-allowable for ratemaking		0	(1,585)	(1,544)

Adj.# Per App.	Adj.# Per ORS	Description (000 s Offitted)		SCE&G Total Electric	ORS Total Electric	ORS Retail Electric
	27	Remove write-off of Abandoned Projects not used and useful		0	(105)	(102)
		Total Operating and Maintenance Expenses	\$_	45,074	6,163	15,271
	(B)	Total Operating and Maintenance Expense - Fuel	\$_	(8,476)	0	0
	(C)	Total Operating and Maintenance Expense - Other	\$_	53,550	6,163	15,271
	(D)	Depreciation and Amortization Expense				
5	28	Remove depreciation expense related to employee clubs	\$	(180)	(180)	(175)
9	29	Recognize depreciation for additional CWIP plant additions		643	643	623
10	30	Annualize depreciation based on current rates		2,019	0	0
11	31	Annualize for the effect of the new depreciation study		(13,441)	(13,475)	(13,183)
12	32	Include depreciation expense for Cope SCR		2,922	2,922	2,810
13	33	Include depreciation expense for Peaking Turbines		2,076	1,972	1,897
14	34	Amortize deferral of Peaking Turbines		208	0	0
15	35	Adjust for depreciation of Wateree Environmental Plant		11,992	0	0
16	36	Amortize Wateree Environmental deferred expenses	_	1,514	0	0
		Total Depreciation and Amortization Expense	\$_	7,753	(8,118)	(8,028)
1	<b>(E)</b> 37	<u>Taxes Other Than Income</u> Annualize payroll taxes for wages and benefits	\$	506	240	231
2	38	Adjust payroll taxes related to incentive pay		(525)	(1,050)	(1,021)
7	39	Remove other taxes associated with new nuclear generation		(22)	(22)	(22)
19	40	Annualize property tax expense for pro forma plant additions		5,457	4,322	4,212
26	41	Adjust for other taxes associated with the wholesale customer		(76)	(76)	0
	42	Adjust for gross receipts taxes associated with suspension of the Storm Reserve Fund	_	0	29	29
		Total Taxes Other Than Income	\$_	5,340	3,443	3,429
28	(F) 43	Income Taxes Adjust for Economic Impact Zone credits for state and federal taxes	\$	(7,313)	(16,576)	(16,153)
35	44	Tax Effect of Annualized Interest		3,252	3,967	3,799
	45	Adjust for the effect of pro forma adjustments on state and federal income taxes. See Audit Exhibit SGS-3.	_	(30,427)	(6,297)	(3,459)
		Total Income Tax Adjustments	\$_	(34,488)	(18,906)	(15,813)

Adj.# Per App.	Adj.# Per ORS	Description (000's Grintled)		SCE&G Total Electric	ORS Total Electric	ORS Retail Electric
	(G)	Customer Growth				
	46	Adjust customer growth for total and retail electric operations related to the accounting and pro forma adjustments.	\$	(162)	8_	23
		Total Customer Growth	\$	(162)	8	23
	(H)	Interest on Customer Deposits				
	47	Annualize interest on customer deposits (net of taxes)	\$	0	(22)	(22)
		Total Interest on Customer Deposits	\$	0	(22)	(22)
	(1)	Plant in Service				
5	48	Remove employee clubs	\$	(4,829)	(4,829)	(4,703)
6	49	Recognize property retirements		(4,348)	(3,991)	(3,839)
8	50	Adjust for CWIP closed to plant in service		12,728	10,256	10,082
9	51	Adjust for additional CWIP closed to plant after test year		17,083	17,083	16,563
13	52	Increase plant in service for peaking turbines		44,653	42,412	40,798
15	53	Adjust for Wateree Environmental CWIP		283,378	0	0
	54	Remove capital expenditure savings associated with the new facility	_	0	(216)	(211)
		Total Plant in Service	\$	348,665	60,715	58,690
	(J)	Accumulated Depreciation				
5	55	Remove employee clubs	\$	(1,435)	(1,435)	(1,397)
6	56	Recognize property retirements		(4,348)	(3,991)	(3,839)
9	57	Recognize additions for additional CWIP		643	643	623
10	58	Annualize depreciation based on current rates		2,020	0	0
11	59	Annualize the effect of the new depreciation study		(13,440)	(13,475)	(13,183)
12	60	Adjust for depreciation expense for Cope SCR		2,922	2,922	2,810
13	61	Adjust for depreciation associated with Peaking Turbines		2,076	1,972	1,897
15	62	Adjust for Wateree Environmental CWIP	_	11,992	0	0
		Total Accumulated Depreciation	\$_	430	(13,364)	(13,089)

Adi.#	Adj.#			SCE&G	ORS	ORS
Per	Per ORS	Description		Total Electric	Total Electric	Retail Electric
	(K)	Construction Work in Progress (CWIP)				
7	63	Remove CWIP associated with new nuclear generation	\$	(388,203)	(388,203)	(373,432)
8	64	Decrease CWIP for property additions closed to plant in service		(5,871)	(5,871)	(5,863)
9	65	Decrease CWIP for additional property closed to plant in service		(16,957)	(16,957)	(16,462)
15	66	Adjust for Wateree Environmental in CWIP	_	(259,693)	6,535	6,286
		Total Construction Work in Progress (CWIP)	\$_	(670,724)	(404,496)	(389,471)
	(L)	Deferred Debits/Credits				
	67	Adjust the storm damage reserve for payment of excess storm damage premiums. See Audit Exhibit SGS-4.	\$_	0	(407)	(407)
		Total Deferred Debits/Credits	\$_	. 0	(407)	(407)
	(M)	Working Capital				
	68	Adjust working capital for pro forma adjustments, customer deposits, nuclear refueling, and unclaimed funds See Audit Exhibit SGS-5.	\$_	1,501	(2,372)	(1,141)
		Total Working Capital	\$_	1,501	(2,372)	(1,141)
	(N)	Materials and Supplies				
27	69	Adjust fuel inventory to reflect recommended levels	_	26,615	(25,888)	(24,601)
		Total Material and Supplies	_	26,615	(25,888)	(24,601)

Adj.#	Adj.#		Company's
Per	Per		Proposed
Арр.	ORS	Description	Increase
	(O)	Operating Revenues for Proposed Increase - Per SCE&G Application	
	70	To adjust revenues for the proposed increase	\$ 197,575
		Total for Proposed Increase	\$ 197,575
	(P)	Taxes Other Than Income	
	71	To adjust for most recent gross receipts tax for the proposed increase	\$894
		Total Taxes Other Than Income	\$894
	(Q)	Income Taxes for Proposed Increase	
	72	To adjust state (5%) and federal income (35%) taxes for the proposed increase. See Audit Exhibit SGS-3.	\$ 75,230
		Total Income Taxes for Proposed Increase	\$ 75,230
	(R)	Customer Growth	
	73	To adjust customer growth (.003412) for adjustments to operating revenues and expenses related to the proposed increase	\$414_
		Total Customer Growth for Proposed Increase	\$414

# South Carolina Electric & Gas Company Calculation of State and Federal Income Taxes For the Test Year Ended September 30, 2009 Docket No. 2009-489-E (000's Omitted)

## FOR ACCOUNTING AND PRO FORMA ADJUSTMENTS

	ORS Total Accounting & Pro Forma Adjustments	ORS Retail Accounting & Pro Forma Adjustments
Operating Revenues Less:	\$ (14,976)	\$ 1,629
O&M Expenses - Fuel	0	0
O&M Expenses - Other	6,163	15,271
Dep. & Amort. Expenses	(8,118)	(8,028)
Taxes Other Than Income	3,443	3,429
Net Accounting and Pro forma Adjustments	(16,464)	(9,043)
Less: State Taxes @ 5%	(823)	(452)
Federal Taxable Income	(15,641)	(8,591)
Federal Taxes @ 35%	(5,474)	(3,007)
Total State and Federal Income Tax Adjustment - ORS Adjustment #45	\$ (6,297)	\$ (3,459)
FOR PROPOSED INCREASE ADJUSTMENTS		
Operating Revenues		\$ 197,575
Less: O&M Expenses - Fuel		0
O&M Expenses - Other		0
Dep. & Amort. Expenses		0
Taxes Other Than Income		894
Net Accounting and Pro forma Adjustments		196,681
State Taxes @ 5%		9,834
Federal Taxable Income		186,847
Federal Taxes @ 35%		65,396
Total State and Federal Income Tax		
Adjustments - ORS Adjustment #72		\$ 75,230

# South Carolina Electric & Gas Company Deferred Debits/Credits Test Year Ended September 30, 2009 Docket No. 2009-489-E (000's Omitted)

	Reg	gulatory Per Books	ORS Accounting & Pro Forma Adjustments	& F	After counting Pro Forma ustments	 ocated to Retail
Other Post Employment Benefits	\$	(81,893)	\$ 0	\$	(81,893)	\$ (79,625)
Deferred Environmental Costs		(232)	0		(232)	(226)
Storm Damage Reserve		(31,289)	(407)		(31,696)	(31,707)
Major Maintenance Accrual		(726)	0		(726)	 (690)
Total - ORS	\$	(114,140)	\$ (407)	<u>\$</u>	(114,547)	\$ (112,248)
Total - SCE&G	\$	(114,140)	0		(114,140)	\$ (111,832)

### South Carolina Electric & Gas Company Working Capital Investment Test Year Ended September 30, 2009 Docket No. 2009-489-E 000's Omitted

		Total Electric			Retail Electric	
	Regulatory Per Books	ORS Accounting & Pro Forma Adjustments	After Accounting & Pro Forma Adjustments	Retail Per Books	ORS Accounting & Pro Forma Adjustments	After Accounting & Pro Forma Adjustments
Operating & Maintenance Expenses	\$ 1,270,361	\$ 6,163	\$ 1,276,524	\$ 1,217,686	\$ 15,271	\$ 1,232,957
Less: Purchased Power Expense **	226,360	28,154	254,514	215,684	27,075	242,759
Nuclear Fuel Expense	26,929	0	26,929	25,590	0	25,590
	1,017,072	(21,991)	995,081	976,412	(11,804)	964,608
1/8 of O&M Expenses (Less Fuel):	0.125	0.125	0.125	0.125	0.125	0.125
Working Cash	127,134	(2,749)	124,385	122,052	(1,475)	120,576
Prepayments	47,475	0	47,475	47,153	0	47,153
Total Investor Advanced Funds	174,609	(2,749)	171,860	169,205	(1,475)	167,730
Less: Customer Deposits	(28,692)	(35)	(28,727)	(28,692)	(35)	(28,727)
Average Tax Accruals	(74,306)	0	(74,306)	(73,531)	0	(73,531)
Nuclear Refueling Cycle	(6,792)	900	(5,892)	(6,470)	857	(5,613)
Injuries and Damages	(4,863)	0	(4,863)	(4,739)	0	(4,739)
Unclaimed Funds	0	(488)	(488)	0_	(488)	(488)
Total Working Capital - ORS	\$ 59,956	\$ (2,372)	\$ 57,584	\$ 55,773	\$ (1,141)	\$ 54,632
Total Working Capital - Company	\$ 59,956	\$ 1,501	\$ 61,457	\$ 55,773	\$ 2,684	\$ 58,457

<sup>\*\*</sup> Includes the removal of Genco Fuel since working capital is included on the Genco fuel invoices.

#### South Carolina Electric & Gas Company Weighted Cost of Capital Retail Electric Operations For the Test Year Ended September 30, 2009 Docket No. 2009-489-E

(000's Omitted)

				Retail Pe	r Books	After ORS Accounting and Pro Forma Adjustments			stments	After Company's Proposed Increase				
						Income				Income	•			Income
	Capital		Rate	Embedded	Overall	For	Rate	Embedded	Overali	For	Rate	Embedded	Overall	For
Description	Structure	Ratio	Base	Cost/Return	Cost/Return	Return	Base	Cost/Return	Cost/Return	Return	Base	Cost/Return	Cost/Return_	Return
							-							
Long-Term Debt* \$	2,790,425	47.04% \$	2,400,537	6.14%	2.89% \$	147,393 \$	2,238,794	6.14%	2.89% \$	137,462 \$	2,238,794	6.14%	2.89% \$	137,462
Common Equity*	3,141,459	52.96%	2,702,646	7.62%	4.03%	205,813	2,520,548	8.83%	4.67%	222,515	2,520,548	13.66%	7.23%	344,380
' ' -											•			
Totals \$	5,931,884	100.00% \$	5,103,183		6.92% \$	353,206 \$	4,759,342		7.56% \$	359,977 \$	4,759,342		10.12% \$	481,842
10000				:				•				= :		

<sup>\*</sup> Includes additional \$133.8 million in equity and \$150 million in debt which occurred after the close of the test year.

## South Carolina Electric & Gas Company Computation of Revenue Requirement For the Test Year Ended September 30, 2009 Docket No. 2009-489-E (000's Omitted)

Line <u>No.</u>	Description	<u>Per</u>	Stipulation
1 2	Jurisdictional Rate Base Required Rate of Return	\$	4,759,342 8.56%
3 4	Required Return Actual Return Earned		407,400 359,977
5 6	Required Increase to Return Factor to Remove Customer Growth		47,423 1.0034120
7 8	Additional Return Required from Revenue Increase Composite Tax Factor		47,262 0.61471
9	Additional Revenue at 10.7% ROE	\$	76,885

## Weighted Cost of Capital

<u>Description</u>	Capital Structure	Ratio	Embedded Cost/Return	Overall Cost/Return	
Long-Term Debt	\$2,790,425,000	47.04%	6.14%	2.89%	
Common Equity	3,141,458,601	52.96%	10.70%	5.67%	
Totals	\$5,931,883,601	100.00%	. =	8.56%	